

## REMARKS

Claims 1-47 are pending and stand as rejected. Claim 36 is amended to correct a typographical error.

### Claim Rejections – §103

Claims 1, 2, 6, 10-11, 17-18, 21, 22, 26-27, 29-31, 36, 38-39, and 43-44 stand rejected under 35 U.S.C. §103 based on U.S. Patent No. 6,263,341 issued to Smiley (“Smiley”) in view of “Index Interface Links CASE and IBM’s DB2,” by Feuche (“Feuche”).

Smiley discloses:

It is possible that data described by the information repository will not exist in existing operational data bases. It may be the case that the relationship between a data base, it's tables (or segments), and data fields are described in the information repository. It is then possible to further the attributes of a data base in separate tables, related to but separate from, the repository. These are the attribute tables 120. This data can then be used to generate the physical implementations represented by the application data tables 122.

(Column 13, lines 46-55). Presumably, the data tables are generated the old fashioned way, by a human programmer writing executable code by hand. Clearly, Smiley does not disclose “the computer using the definition to generate the set of tables” from a definition that defines “a set of relationships between the tables of the set of tables,” and “programs that operate on the set of tables and the set of table columns,” as recited in claim 1.

Feuche discloses:

The XL/Interface for DB2, Gretjak noted, allows database administrators for the first time automatically to transform logical design data produced in Excelerator into physical design data – specifically, into structured query language (SQL), which can be used to implement a DB2 database.

The link’s DB2 utilities automatically create DB2 entities. For example, the link can automatically create DB2 tables from logical record definitions developed in Excelerator and then enable the database administrator to prototype views and table spaces.

The interface, Gretjak added, eliminates the need to manually re-key design and data requirements, thereby increasing productivity and reducing design discrepancies and system errors. In addition, the link provides access to

Excelerator's analysis and ad hoc reporting capabilities for improving the quality of database designs.

The link incorporates a version of the Excelerator XLDictionary customized to specifically describe and document entities for DB2 applications. It includes seven new entity types tailored for DB2, including column, table, view, index, table space, storage group and database. Changes to the dictionary are automatically tracked and the individuals who made them are identified.

Clearly, Feuche automatically creates DB2 tables from logical definitions in Excelerator. The Excelerator XL Dictionary includes column, table, view, index, table space, storage group and database. Assignee is not claiming "a computer that automatically creates DB2 tables from logical definitions that include column, table, view, index, table space, storage group and database."

Assignee is claiming "the computer using the definition to generate the set of tables" from a definition that defines "a set of relationships between the tables of the set of tables," and "programs that operate on the set of tables and the set of table columns," as recited in claim 1.

Feuche does not disclose "the computer using the definition to generate the set of tables" from a definition that defines "a set of relationships between the tables of the set of tables," and "programs that operate on the set of tables and the set of table columns," as recited in claim 1.

Even if Smiley and Feuche were combined, the combination would neither teach nor suggest "the computer using the definition to generate the set of tables" from a definition that defines "a set of relationships between the tables of the set of tables," and "programs that operate on the set of tables and the set of table columns," as recited in claim 1.

A person who modifies Smiley's system in view of Feuche's interface to automatically create DB2 tables from definitions that do not define "a set of relationships between tables" and "programs that operate on the set of tables and the set of table columns" would still not have a computer that generates tables from definitions that define "a set of relationships between tables and programs that operate on the set of tables and the set of table columns," as recited in claim 1.

Assignee further submits that modifying Smiley's data objects and Feuche's index interface to have "the computer using the definition to generate the set of tables" from a definition that defines "a set of relationships between the tables of the set of tables," and "programs that operate on the set of tables and the set of table columns," as taught only by assignee's disclosure and recited in claim 1, is impermissible hindsight

Therefore, Assignee submits that claim 1 is patentable over Smiley in view of Feuche.

Given that claims 2, 6, 10-11 and 17-18 depend from claim 1, Assignee submits that these claims are also patentable over Smiley in view of Feuche.

Claim 21 recites "the first program further for using the definition to generate the set of tables." Smiley and Feuche, alone or in combination, neither disclose nor suggest "the computer using the definition to generate the set of tables" from a definition that defines "a set of relationships between the tables of the set of tables," and that defines "programs that operate on the set of tables and the set of table columns," as recited in claim 1. Therefore, Assignee submits that claim 21 is patentable over Smiley in view of Feuche. Given that claims 22, 26-27 and 29 depend from claim 21, Assignee submits that these claims are also patentable over Smiley.

Claim 30 recites "means for using the definition to generate the set of tables." Smiley and Feuche, alone or in combination, neither disclose nor suggest "means for using the definition to generate the set of tables." Therefore, Assignee submits that claim 30 is patentable over Smiley in view of Feuche. Given that claims 31 and 36 depend from claim 30, Assignee submits that these claims are also patentable over Smiley in view of Feuche.

Claims 38 and 43 recite "instructions for using the definition to generate the set of tables." Smiley and Feuche, alone or in combination, neither disclose nor suggest "instructions for using the definition to generate the set of tables." Therefore, Assignee submits that claims 38 and 43 are patentable over Smiley in view of Feuche. Given that claim 39 depends from claim 38, Assignee submits that this claim is also patentable over Smiley in view of Feuche. Given that claim 44 depends from claim 43, Assignee submits that this claim is patentable over Smiley in view of Feuche.

### **Claim Rejections – §103**

Claims 3, 5, 23, 25, 32, 34, 40, 42, 45 and 47 stand rejected under 35 U.S.C. 103 based on Smiley in view Feuche and further in view of U.S. Patent No. 5,295,256 issued to Bapat (“Bapat”).

As discussed above, Smiley and Feuche, alone or in combination, neither disclose nor suggest “the computer using the definition to generate the set of tables.”

The Office action states that “Bapat teaches generating a foreign key column.” As the Examiner implicitly concedes, however, that Bapat does not disclose “the computer using the definition to generate the set of tables.”

As a result, even if Smiley, Feuche, and Bapat were combined, the combination would neither teach nor suggest “the computer using the definition to generate the set of tables,” as recited in claim 1. Therefore, Assignee submits that claim 1 is patentable over Smiley in view of Feuche and Bapat. Given that claims 3 and 5 depend from claim 1, Assignee submits that these claims are also patentable over Smiley in view of Feuche and Bapat.

Claim 21 recites “the first program further for using the definition to generate the set of tables.” Smiley, Feuche, and Bapat, alone or in combination, neither teach nor suggest “the first program further for using the definition to generate the set of tables.” Therefore, Assignee submits that claim 21 is patentable over Smiley in view of Feuche and Bapat. Given that claims 23 and 25 depend from claim 21, Assignee submits that these claims are also patentable over Smiley in view of Feuche and Bapat.

Claim 30 recites “means for using the definition to generate the set of tables.” Smiley, Feuche, and Bapat, alone or in combination, neither teach nor suggest “means for using the definition to generate the set of tables.” Therefore, Assignee submits that claim 30 is patentable over Smiley in view of Feuche and Bapat. Given that claims 32 and 34 depend from claim 30, Assignee submits that these claims are patentable over Smiley in view of Feuche and Bapat.

Claims 38 and 43 recite “instructions for using the definition to generate the set of tables.” Smiley, Feuche, and Bapat, alone or in combination, neither teach nor suggest “instructions for using the definition to generate the set of tables.” Therefore, Assignee submits that claims 38 and 43 are patentable over Smiley in view of Feuche and Bapat. Given that claims 40 and 42 depend from claim 38, Assignee submits that these claims are patentable over Smiley in view of Feuche and Bapat. Given that claims 45 and 47 depend from claim 43, Assignee submits that these claims are patentable over Smiley in view of Feuche and Bapat.

Claims 4, 7, 24, 33, 41 and 46 stand rejected under Smiley in view of Feuche and further in view of U.S. Patent No. 5,249,300 issued to Bachman et al. (“Bachman”).

As discussed above, Smiley and Feuche, alone or in combination, neither disclose nor suggest “the computer using the definition to generate the set of tables.”

The Office action states that “Bachman teaches ... many to many relationship.” The Examiner implicitly concedes, however, that Bachman does not disclose “the computer using the definition to generate the set of tables.”

As a result, even if Smiley, Feuche, and Bachman were combined, the combination would neither teach nor suggest “the computer using the definition to generate the set of tables,” as recited in claim 1. Therefore, Assignee submits that claim 1 is patentable over Smiley in view of Feuche and Bachman. Given that claims 4 and 7 depend from claim 1, Assignee submits that these claims are also patentable over Smiley in view of Feuche and Bachman.

Claim 21 recites “the first program further for using the definition to generate the set of tables.” Smiley, Feuche, and Bachman, alone or in combination, neither teach nor suggest “the first program further for using the definition to generate the set of tables.” Therefore, Assignee submits that claim 21 is patentable over Smiley in view of Feuche and Bachman. Given that claim 24 depends from claim 21, Assignee submits that this claim is also patentable over Smiley in view of Feuche and Bachman.

Claim 30 recites “means for using the definition to generate the set of tables.” Smiley, Feuche, and Bachman, alone or in combination, neither teach nor suggest “means for using the

definition to generate the set of tables.” Therefore, Assignee submits that claim 30 is patentable over Smiley in view of Feuche and Bachman. Given that claim 33 depends from claim 30, Assignee submits that this claim is patentable over Smiley in view of Feuche and Bachman.

Claims 38 and 43 recite “instructions for using the definition to generate the set of tables.” Smiley, Feuche, and Bachman, alone or in combination, neither teach nor suggest “instructions for using the definition to generate the set of tables.” Therefore, Assignee submits that claims 38 and 43 are patentable over Smiley in view of Feuche and Bachman. Given that claim 41 depends from claim 38, Assignee submits that this claim is patentable over Smiley in view of Feuche and Bachman. Given that claims 46 depends from claim 43, Assignee submits that this claim is patentable over Smiley in view of Feuche and Bachman.

Claim 8 stands rejected under 35 U.S.C. 103 based on Smiley in view of Feuche and further in view of U.S. Patent No. 6,263,341 issued to Skinner et al. (“Skinner”).

As discussed above, Smiley and Feuche, alone or in combination, neither disclose nor suggest “the computer using the definition to generate the set of tables.”

The Office action states that “Skinner teaches a date column.” The Examiner implicitly concedes, however, that Skinner does not disclose “the computer using the definition to generate the set of tables.”

As a result, even if Smiley, Feuche, and Skinner were combined, the combination would neither teach nor suggest “the computer using the definition to generate the set of tables,” as recited in claim 1. Therefore, Assignee submits that claim 1 is patentable over Smiley in view of Feuche and Skinner. Given that claim 8 depends from claim 1, Assignee submits that these claims are also patentable over Smiley in view of Feuche and Skinner.

Claim 9 stands rejected under 35 U.S.C. 103 based on Smiley in view of Feuche and further in view of U.S. Patent No. 6,167,405 issued to Rosensteel (“Rosensteel”).

As discussed above, Smiley and Feuche, alone or in combination, neither disclose nor suggest “the computer using the definition to generate the set of tables.”

The Office action states that "Rosensteel teaches a source system key column." The Examiner implicitly concedes, however, that Rosensteel does not disclose "the computer using the definition to generate the set of tables."

As a result, even if Smiley, Feuche, and Rosensteel were combined, the combination would neither teach nor suggest "the computer using the definition to generate the set of tables," as recited in claim 1. Therefore, Assignee submits that claim 1 is patentable over Smiley in view of Feuche and Rosensteel. Given that claim 9 depends from claim 1, Assignee submits that these claims are also patentable over Smiley in view of Feuche and Rosensteel.

Claims 12-16, 19 and 28 stand rejected under 35 U.S.C. 103 based on Smiley in view of Feuche and further in view of U.S. Patent No. 5,272,628 issued to Koss ("Koss").

As discussed above, Smiley and Feuche, alone or in combination, neither disclose nor suggest "the computer using the definition to generate the set of tables."

The Office action states that "Koss teaches a method comprising...creating a set of aggregate tables." The Examiner implicitly concedes, however, that Koss does not disclose "the computer using the definition to generate the set of tables."

As a result, even if Smiley, Feuche and Koss were combined, the combination would neither teach nor suggest "the computer using the definition to generate the set of tables," as recited in claim 1. Therefore, Assignee submits that claim 1 is patentable over Smiley in view of Feuche and Koss. Given that claims 12-16 and 19 depend from claim 1, Assignee submits that these claims are also patentable over Smiley in view of Feuche and Koss.

Claim 21 recites "the first program further for using the definition to generate the set of tables." Smiley, Feuche, and Koss, alone or in combination, neither teach nor suggest "the first program further for using the definition to generate the set of tables." Therefore, Assignee submits that claim 21 is patentable over Smiley in view of Feuche and Koss. Given that claim 28 depends from claim 21, Assignee submits that this claim is also patentable over Smiley in view of Feuche and Koss.

Claim 20 stands rejected under 35 U.S.C. 103 based on Smiley in view Feuche and further in view of U.S. Patent No. 6,282,544 issued to Tse et al. ("Tse").

As discussed above, Smiley and Feuche, alone or in combination, neither disclose nor suggest "the computer using the definition to generate the set of tables."

The Office action states that "Tse teaches a datamart." The Examiner implicitly concedes, however, that Tse does not disclose "the computer using the definition to generate the set of tables."

As a result, even if Smiley, Feuche, and Tse were combined, the combination would neither teach nor suggest "the computer using the definition to generate the set of tables," as recited in claim 1. Therefore, Assignee submits that claim 1 is patentable over Smiley in view of Feuche and Tse. Given that claim 20 depends from claim 1, Assignee submits that this claim is also patentable over Smiley in view of Feuche and Tse.

Claim 35 stands rejected under 35 U.S.C. 103 based on Smiley in view of Feuche and further in view of Bapat and Koss.

Claim 30 recites "means for using the definition to generate the set of tables." Smiley, Feuche, Bapat, and Koss, alone or in combination, neither teach nor suggest "means for using the definition to generate the set of tables." Therefore, Assignee submits that claim 30 is patentable over Smiley in view of Feuche, Bapat, and Koss. Given that claim 35 depends from claim 30, Assignee submits that this claim is patentable over Smiley in view of Feuche, Bapat, and Koss.

Claim 37 stands rejected under 35 U.S.C. 103 based on Smiley in view of Feuche and further in view of Koss and Bachman.

Claim 30 recites "means for using the definition to generate the set of tables." Smiley, Feuche, Koss, and Bachman, alone or in combination, neither teach nor suggest "means for using the definition to generate the set of tables." Therefore, Assignee submits that claim 30 is patentable over Smiley in view of Feuche, Koss, and further in view of Bachman. Given that

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claim 37 depends from claim 30, Assignee submits that this claim is patentable over Smiley in view of Feuche, Koss, and Bachman.

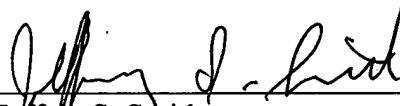
### Conclusion

Reconsideration and allowance of all pending claims are respectfully requested. The Examiner may call the Assignee's attorney at (650) 849-4422 to further advance prosecution of this case to issuance.

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Respectfully submitted,

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